

August 19, 2009

Ms. Laura Sinram  
Senior Campaign Finance Analyst  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Dear Ms. Sinram:

The National Republican Congressional Committee (FEC ID# C0075820) is in receipt of your Request for Additional Information dated July 15, 2009 regarding our 2009 February Monthly FEC report.

With respect to the receipts from the three limited liability companies: these entities are treated as partnerships under IRS rules, and thus these are permissible donations. We have now made two requests to each of the entities that they provide us information with respect to the individual members to whom the donations are to be attributed. Should any of the attributions to an individual exceed \$200 aggregate, we will amend our report to reflect the applicable individual attribution(s).

The Committee initially reported a refund of \$ 20,000 to Michael Bowen on 6/29/07, a check which was voided on 1/31/09. The replacement check to Mr. Bowen had been reissued on 1/27/09. All three transactions were reported properly.

The report reflects the Committee's correct beginning cash-on-hand at 1/1/09, as determined at the conclusion of the Committee's review of its financial records conducted during 2008, and in reported in accordance with guidance received in January 2009 from representatives of the Commission's Office of General Counsel and Reports Analysis Division.

All negative amounts on Schedule B for line 21b, as referenced in your letter, represent void checks. All offsets to operating expenditures that represent actual amounts deposited by the Committee are, as indicated in your letter, reported as receipts on Schedule A for line 15.

The line 15 receipts referenced in your letter from Goddard for Congress, Lyle Larson for Congress, Lynn Jenkins for Congress, and Ozinga for Congress result not from expenditures to these entities, but from payments made to Kevin McGrann. The receipts from Musgrave for Congress and Upton for All of Us result not from payments made to the entities, but from payments made to the Republican National Committee. Refunds from these campaign committees were at exact cost, and thus represented the usual and normal charge.

The Line 15 receipt from JCM Fair Fund QSF represents a rebate for retirement benefit payments originally made to Transamerica East.

Regarding the void checks totaling \$ 58,021.83 with respect to the following vendors:

Joseph M. Boland, III - the original payment for \$ 33.40 was disclosed on the February 2006 monthly report.  
Burlington Northern Santa Fe - the original payment for \$ 1,134.80 was disclosed on the March 2005 monthly report; the original payment for \$ 567.40 was disclosed on the March 2005 monthly report; the original payment for \$ 2,542.50 was disclosed on the July 2005 monthly report in the invoice amounts of \$ 1,271.25 and \$ 1,271.25.

Erin E. Casey - the original payment for \$ 1,585.04 was disclosed on the August 2005 monthly report, in the invoice amounts of \$ 186.72, \$ 886.20, \$ 209.27, and \$302.85.

Sara A. Conahan - the original payment for \$ 171.10 was disclosed on the October 2006 monthly report.

Congressional Color Graphics - the original payment for \$ 63.00 was disclosed on the July 2005 monthly report, in the

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